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**SEALED**

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

HAROLD CALL,

DEFENDANT.

CRIMINAL INDICTMENT

2:09-CR- 079

**VIOLATIONS:**

18 U.S.C. § 922(o) - Possession and  
Transfer of Machine Gun  
26 U.S.C. §§ 5845 and 5861 -  
Possession of Unregistered Machine Gun

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Possession and Transfer of Machine Gun

On or about September 11, 2008, in the State and Federal District of Nevada,

**HAROLD CALL,**

the defendant herein, did knowingly possess and transfer a machine gun, as defined by Title 18, United States Code, Section 921(a)(23), and Title 26, United States Code, Section 5845(b), specifically, a combination of parts, referred to by the defendant as an "auto sear" and also commonly known as a "lightning link," designed and intended for use in converting a weapon to shoot automatically more than one shot, without manual reloading,

1 by a single function of the trigger. In violation of Title 18, United States Code, Sections  
2 922(o) and 924(a)(2).

3 **COUNT TWO**

4 Possession of Unregistered Machine Gun

5 On or about September 11, 2008, in the State and Federal District of Nevada,

6 **HAROLD CALL,**

7 defendant herein, did knowingly possess a firearm, as defined by Title 26, United States  
8 Code, Section 5845(a)(7), and Title 18, United States Code, Section 921(a)(24), namely, a  
9 machine gun, that is a combination of parts, referred to by the defendant as an "auto sear"  
10 and also commonly known as a "lightning link," designed and intended for use in converting  
11 a weapon to shoot automatically more than one shot, without manual reloading, by a single  
12 function of the trigger, which was not registered to him in the National Firearms Registration  
13 and Transfer Record, as required by Title 26, United States Code, Section 5841. In violation  
14 of Title 26, United States Code, Sections 5861(d) and 5871.

15 **COUNT THREE**

16 Possession of Unregistered Machine Gun

17 On or about October 9, 2008, in the State and Federal District of Nevada,

18 **HAROLD CALL,**

19 defendant herein, did knowingly possess a firearm, as defined by Title 26, United States  
20 Code, Section 5845(a)(7), and Title 18, United States Code, Section 921(a)(24), namely, a  
21 machine gun, that is, a STEN machine gun, which was not registered to him in the National  
22 Firearms Registration and Transfer Record, as required by Title 26, United States Code,  
23 Section 5841. In violation of Title 26, United States Code, Sections 5861(d) and 5871.

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**COUNT FOUR**  
Possession and Transfer of Machine Gun

On or about January 20, 2009, in the State and Federal District of Nevada,

**HAROLD CALL,**

the defendant herein, did knowingly possess and transfer a machine gun, as defined by Title 18, United States Code, Sections 921(a)(23), and Title 26, United States Code, Section 5845(b), specifically, a combination of parts, referred to by the defendant as an "auto sear," designed and intended for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger. In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

**COUNT FIVE**  
Possession of Unregistered Machine Gun

On or about January 20, 2009, in the State and Federal District of Nevada,

**HAROLD CALL,**

defendant herein, did knowingly possess a firearm, as defined by Title 26, United States Code, Section 5845(a)(7), and Title 18, United States Code, Section 921(a)(24), namely, a machine gun, that is a combination of parts, referred to by the defendant as an "auto sear," designed and intended for use in converting a weapon to shoot automatically more than one shot, without manual reloading, by a single function of the trigger, which was not registered to him in the National Firearms Registration and Transfer Record, as required by Title 26, United States Code, Section 5841. In violation of Title 26, United States Code, Sections 5861(d) and 5871.

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**FORFEITURE ALLEGATION ONE**

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2           1.     The allegations contained in Counts One and Four of this Indictment  
3 are hereby re-alleged and incorporated herein by reference for the purpose of alleging  
4 forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), and  
5 Title 28, United States Code, Section 2461(c).

6           2.     Upon a conviction of the felony offense charged in this Indictment,  
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8                         **HAROLD CALL,**  
9 the defendant herein, shall forfeit to the United States of America all firearms and  
10 ammunition involved in or used in the commission of the violation of Title 18, United States  
Code, Section 922(o):

- 11                         a)     a machine gun, specifically, a combination of parts,  
12 referred to by the defendant as an "auto sear" and also  
13 commonly known as a "lightning link," designed and  
14 intended for use in converting a weapon to shoot  
15 automatically more than one shot, without manual  
16 reloading, by a single function of the trigger; and  
17                         b)     a machine gun, specifically, a combination of parts, referred to  
18 by the defendant as an "auto sear," designed and intended for  
19 use in converting a weapon to shoot automatically more than  
20 one shot, without manual reloading, by a single function of the  
21 trigger.

22                         All pursuant to Title 18, United States Code, Sections 922(o) and 924(d)(1);  
23 and Title 28, United States Code, Section 2461(c).

**FORFEITURE ALLEGATION TWO**

1  
2           1.     The allegations contained in Counts Two, Three and Five of this  
3 Indictment are hereby re-alleged and incorporated herein by reference for the purpose of  
4 alleging forfeiture pursuant to the provisions of Title 26, United States Code, Section 5872,  
5 and Title 28, United States Code, Section 2461(c).

6           2.     Upon a conviction of the felony offense charged in this Indictment,  
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8                     **HAROLD CALL,**  
9 the defendant herein, shall forfeit to the United States of America all firearms involved in any  
violation of Title 26, United States Code, Section 5861(d):

- 10                   a)     a machine gun, that is a combination of parts, referred to  
11                             by the defendant as an "auto sear" and also commonly  
12                             known as a "lightning link," designed and intended for  
13                             use in converting a weapon to shoot automatically more  
14                             than one shot, without manual reloading, by a single  
15                             function of the trigger  
16                   b)     a STEN machine gun; and  
17                   c)     a machine gun, that is a combination of parts, referred to by the  
18                             defendant as an "auto sear," designed and intended for use in  
19                             converting a weapon to shoot automatically more than one shot,  
20                             without manual reloading, by a single function of the trigger.

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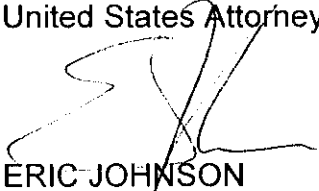
1 All pursuant to Title 26, United States Code, Sections 5861 and 5872; and Title  
2 28, United States Code, Section 2461(c).

3 **DATED:** this 3 th day of March 2009.

4 **A TRUE BILL:**

5  
6 /s/  
7 FOREPERSON OF THE GRAND JURY

8 GREGORY A. BROWER  
9 United States Attorney

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11 ERIC JOHNSON  
12 Assistant United States Attorney  
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